

# **EXHIBIT A**



U.S. Department of Justice

United States Attorney  
Western District of New York

Federal Center  
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Buffalo, New York 14202

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April 5, 2021

Harrington & Mahoney  
70 Niagara Street  
Buffalo, New York 14202  
Attn: James P. Harrington, Esq.

Joel Daniels, Esq.  
42 Delaware Avenue, Suite 700  
Buffalo, New York 14202

RE: United States v. Joseph Bongiovanni and Peter Gerace Jr.  
19-CR-227

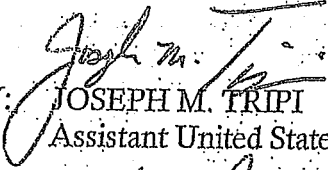
Dear Counsel:




A cellular telephone seized from Peter Gerace Jr., namely, One (1) Apple iPhone 11 Pro, green in color, and bearing IMEI: 353248101165460, seized by law enforcement on February 28, 2021, was subsequently searched pursuant to a search warrant, a copy of this cell phone extraction will be provided upon receipt by the government pursuant to Rule 16(c). Pursuant to Rule 12(b)(4), as distinguished from the above-described devices pertaining to Peter Gerace Jr., the government intends to introduce evidence from this Apple iPhone 11 Pro, green in color, and bearing IMEI: 353248101165460 during its case-in-chief at trial.

Very truly yours,

JAMES P. KENNEDY, JR.  
United States Attorney

  
BY: JOSEPH M. TRIPI  
Assistant United States Attorney

  
BY: BRENDAN T. CULLINANE  
Assistant United States Attorney

cc: Joseph LaTona, Esq. (w/o encls.)

# **EXHIBIT B**

**Sandy Wright**

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**From:** Cullinane, Brendan (USANYW) <Brendan.Cullinane@usdoj.gov>  
**Sent:** Tuesday, June 29, 2021 9:09 AM  
**To:** Joel Daniels; jdaniels38@gmail.com; Sandy Wright; josabele@verizon.net  
**Cc:** Tripi, Joseph (USANYW); Cullinane, Brendan (USANYW)  
**Subject:** U.S. v. Peter Gerace, Jr., 19-CR-227: Redacted SW (21-mj-22) for Phone  
**Attachments:** 21-MJ-22 Application\_Redacted.pdf

Good morning, Joel & Joe,

Please see the attached redacted search warrant application (21-mj-22) to search the phone recovered from Mr. Gerace on February 28, 2021.

Thanks,  
Brendan

Brendan T. Cullinane, Assistant United States Attorney  
Narcotics & Organized Crime Section  
*United States Attorney's Office/WDNY*  
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